

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
	:	
Andrew B. Gardner	:	No. 19-13704-AMC
Kelly A. Gardner	:	
Debtors	:	

ANSWER TO MOTION OF CITIZENS BANK, N.A.
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted
3. Admitted.
4. Admitted some payments were missed. Debtors ask for the chance to catch up.
5. Denied.
6. Denied.

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)

Dated: 3/24/20

CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Mary F. Kennedy on behalf of Citizen Bank, N.A.
mary@javardianlaw.com

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 3/24/20